

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

Hearing Date and Time:
May 11, 2021 at 11:00 a.m.

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In re:

Chapter 11

Genever Holdings LLC,

Case No. 20-12411 (JLG)

Debtor.

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**DEBTOR'S STATEMENT IN OPPOSITION TO THE MOTION
OF PACIFIC ALLIANCE ASIA OPPORTUNITY FUND TO CONVERT
THE CASE TO CHAPTER 7, OR, IN THE ALTERNATIVE, FOR
THE APPOINTMENT OF A CHAPTER 11 OPERATING TRUSTEE**

**TO: THE HONORABLE JAMES L. GARRITY JR.
UNITED STATES BANKRUPTCY JUDGE**

Genever Holdings LLC (the "Debtor"), as and for its Opposition to the motion of Pacific Alliance Asia Opportunity Fund ("PAX") seeking to convert this Chapter 11 case to Chapter 7, or, in the alternative, the appointment of an Operating Trustee pursuant to 11 U.S.C. §1104(a) (the "Motion"), respectfully states and alleges as follows:

1. The Debtor opposes the Motion for all of the reasons set forth in (i) the Debtor's opposition (ECF 22) to PAX's motion for relief from the automatic stay (ECF #12), and (ii) the Debtor's opposition (ECF #83) to the motion of the United States Trustee seeking the appointment of a Chapter 11 Operating Trustee (ECF #64). The Debtor also adopts the objection to the Motion filed by Bravo Luck Limited (ECF #44).

WHEREFORE, the Debtor respectfully requests the entry of an Order denying the Motion filed by PAX.

Dated: New York, New York
May 11, 2021

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By: /s/ J. Ted Donovan